

Exhibit 169

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE: DEALER MANAGEMENT
SYSTEMS ANTITRUST LITIGATION

This Document Relates To:

Motor Vehicle Software Corp. v. CDK Global, Inc., et al., Case No. 1:18-cv-865 (N.D. Ill.)

Authenticom, Inc. v. CDK Global, LLC, et al.,
Case No. 1:18-cv-00868 (N.D. Ill.)

Loop, LLC, d/b/a AutoLoop v. CDK Global, LLC, Case No. 18-cv-2521 (N.D. Ill.)

MDL No. 2817
Case No. 18-cv-00864

Hon. Robert M. Dow, Jr.
Magistrate Judge Jeffrey T. Gilbert

DECLARATION OF ERIC KIMBERLING

I, Eric Kimberling, declare as follows:

1. I have personal knowledge of the facts set forth in this Declaration. If called upon as a witness, I could and would testify competently to them.
2. I submitted an expert report in this MDL case on November 15, 2019 (“Report”).
3. The statements made in my Report constitute my opinions and testimony in this MDL case. I hereby verify the statements made in my Report.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and that this Declaration was executed in Colorado on May 19, 2020.


Eric Kimberling